



# South Coast Air Quality Management District

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FAXED: JULY 6, 2005

July 6, 2005

Ms. Deborah Woldruff, AICP  
Community Development Director  
City of Loma Linda  
25541 Barton Road  
Loma Linda, CA 92354

**Draft Mitigated Negative Declaration for the Proposed Precise Plan design No. 05-05, California Heart and Surgical Hospital**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final Mitigated Negative Declaration

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final Mitigated Negative Declaration. The SCAQMD staff would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

Steve Smith, Ph.D.  
Program Supervisor, CEQA Section  
Planning, Rule Development & Area Sources

Attachment

SS:GM

SBC050622-04  
Control Number

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**Construction Emissions**

1. The lead agency estimated construction and operation air quality impacts using the California Air Resources Board URBEMIS 2002 computer model and summarized air quality impacts in Tables 1 and 2 of the Draft ND on page 12. Although the lead agency later provided the model's output report to SCAQMD staff, the lead agency did not include the model's report with the Draft ND. Further, large portions of the output report were illegible, even after faxing it a second time. The SCAQMD requests that for this project and all future projects the lead agency provide all supporting air quality information including URBEMIS 2002 output reports. The URBEMIS 2002 output report is important because it includes all of the inputs and changes made to the URBEMIS 2002 model for construction including construction equipment numbers, types, and operating hours per day; total and daily acreage disturbed, the number of vehicle trips, round trip mileage per vehicle trip, etc. All changes should be documented in the Final ND, including any mitigation measure defaults, if any, modified in the model to reduce construction inputs to less than significant. Tables 1 and 2 emission totals on page 12 should also be labeled unmitigated or mitigated. In the Final MND, the lead agency should include this supporting information to support its finding of less than significant air quality impacts.

To verify the lead agency's results, staff has modeled the project using the URBEMIS 2002 model using project information included in the Draft MND and was not able to verify the reductions shown in Table 1 on pages 12. Staff modeling showed potentially significant VOC and NOx construction emissions during the building construction phase of the project. The lead agency should indicate whether or not the construction emission results on page 12 are mitigated or unmitigated. If mitigated, the lead agency needs to identify the mitigation measures used to mitigate impacts to less than significant.

2. The totals from the URBEMIS 2002 output report for construction and operation emissions do not agree with the construction and operations emission summaries in Tables 1 and 2 of the Draft ND. The tables should be consistent with the URBEMIS 2002 output report to support the lead agency's conclusions regarding significance.

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3. The two scenarios described by the lead agency are not well defined. According to the supplemental air quality information provided by the lead agency, Scenario A, using the square footage of the proposed hospital and medical office building as inputs for the land use section of the URBEMIS 2002 model, has significant construction air quality impacts. Scenario B, which uses the number of beds in the proposed hospital, does not appear to generate significant construction air quality impacts. It is not clear what characteristics of the projects produce the differences. In any event, the scenario that exceeds the significance threshold should be rejected and the project that results in less than significant impacts should be more clearly defined in the Final ND and implemented by the lead agency.
4. The discussion in the air quality study states that even though scenario A generates emissions that exceed the construction significance thresholds, the discussion concludes that these emissions are not significant because they are short-term. Because emissions may be temporary in nature does not mean they are insignificant. For example, the attainment status of an area is based on whether or not there are daily exceedances of the applicable ambient air quality standard. Consequently, projects that exceed the SCAQMD short-term daily emissions significance thresholds from a project could potentially affect the attainment status of the area in which it is located and, therefore should be considered significant.

**Mitigation Measures**

5. In the event that the lead agency's revised air quality analysis shows that any criteria pollutant emissions exceed the SCAQMD's daily significance thresholds, the SCAQMD recommends that the lead agency consider adding the following mitigation measures to further reduce volatile organic compounds (VOC) and oxides of nitrogen (NOx) impacts from the project, if feasible:

**VOC**

**Recommended Additions:**

- Use required coatings and solvents with a VOC content lower than required under Rule 1113;
- Construct/build with materials that do not require painting;
- Use pre-painted construction materials.

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**Mitigation Measures, cont.**

NO<sub>x</sub>

Recommended Additions:

- Prohibit truck idling in excess of five minutes.
- Alternative fueled off-road equipment;
- Use street sweepers that comply with SCAQMD Rules 1186 and 1186.1;
- Require or provide incentives to use low sulfur diesel fuel with particulate traps;
- Use electricity from power poles rather than temporary diesel or gasoline power generators;
- Configure construction parking to minimize traffic interference.
- Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow.
- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site.
- Schedule construction activities that affect traffic flow on the arterial system to off-peak hour to the extent practicable;
- Reroute construction trucks away from congested streets or sensitive receptor areas;
- Improve traffic flow by signal synchronization.